NORLITE CORPORATION

628 SO. SARATOGA STREET
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April 3, 2012

Mr. William J. Clarke
Regional Permit Administrator
New York State Department of Environmental Conservation
Region 4
1130 North Westcott Road
Schenectady, NY 12306-2014 RETURN RECEIPT REQUESTED VIA EMAIL

Mr. Kenneth Eng
Air Compliance Branch
United States Environmental Protection Agency
Region 2
290 Broadway
New York, NY 10007-1866 RETURN RECEIPT REQUESTED VIA EMAIL

Re: Norlite Corporation-MACT Excessive Exceedances Report
Kiln 1: 03/13/12 – 04/03/12
Kiln 2: 03/13/12 – 04/03/12

Dear Sirs:

In accordance with 40 CFR 63.1206(c)(3)(vi), the Norlite Corporation (Norlite) is submitting an "Excessive Exceedance Report" for the timeframe of 03/13/12 thru 04/03/12. The attached document explains each of the "malfunctions" for Kilns One & Two.

The results of the investigation concluded a majority of the waste feed cutoffs were a result of the span limit associated with the stack gas flow monitor. Norlite has met with its consultant and a vendor offering new technology to measure stack gas flow. Norlite and its consultant are working with the vendor to determine if this new technology will be applicable for stack gas measurement with Norlite's APC system. Norlite anticipates this new technology will be determined to be applicable. If it is determined this new technology will be useful, Norlite will submit information to the Department to start the approval process for the new detectors. Norlite and its consultant will continue to evaluate each exceedance in order to implement the proper corrective action to further decrease the amount of MACT exceedances.

All of the malfunctions that occurred were consistent with our Startup, Shutdown and Malfunction Plan (SSMP). As approved by the NYSDEC on February 6, 2006, these reports are being sent electronically.

DCL: 2410

Norlite Corporation

Should you have any questions regarding this letter, please contact me at (518) 235-0401 or email at: tvanvranken@norlitecorp.com.

Sincerely,

Thomas Van Vranken

Thomas Van Vranken
Environmental Manager

Attachments
ecc: Don Spencer, NYDEC – R4 w/attachments
James Lansing, NYSDEC – CO w/attachments
Joe Hadersbeck, NYSDEC – R4 w/attachments

DCL: 2410

NORLITE CORPORATION
MACT EXCEEDANCE REPORT - KILN 1
03/13/12 - 04/03/12

Start Date	Start Time	End Date	End Time	Downtime	#	Event	Cause	Parameter	Limit	Corrective Action
3/16/2012	21:38:17	3/16/2012	21:40:58	0:02:41	42	Malfunction	Instantaneous Upper Instrument Setpoint Reached for Stack Gas Span	Stack Gas Flow Rate	Span	Adjusted Fuel Flow
3/22/2012	1:03:26	3/22/2012	1:04:57	0:01:31	43	Malfunction	Instantaneous Upper Instrument Setpoint Reached for Stack Gas Span	Stack Gas Flow Rate	Span	Adjusted Fuel Flow
3/22/2012	14:34:45	3/22/2012	14:36:24	0:01:39	44	Malfunction	Instantaneous Upper Instrument Setpoint Reached for LGF Flow Span	LGF Flow	Span	Adjusted Fuel Flow
3/22/2012	14:36:29	3/22/2012	14:37:02	0:00:33	45	Malfunction	Instantaneous Upper Instrument Setpoint Reached for LGF Flow Span	LGF Flow	Span	Adjusted Fuel Flow
3/22/2012	14:38:04	3/22/2012	15:42:34	1:04:30	46	Malfunction	Instantaneous Upper Instrument Setpoint Reached for LGF Flow Span	LGF Flow	Span	Adjusted Fuel Flow
3/23/2012	0:03:32	3/23/2012	0:21:00	0:17:28	47	Malfunction	Instantaneous Upper Instrument Setpoint Reached for LGF Flow Span	Stack Gas Flow Rate	Span	Adjusted Fuel Flow
3/23/2012	9:31:27	3/23/2012	9:50:43	0:19:16	48	Malfunction	Instantaneous Upper Instrument Setpoint Reached for Stack Gas Span	Stack Gas Flow Rate	Span	Adjusted Fuel Flow
3/26/2012	11:14:55	3/26/2012	11:18:50	0:03:55	49	Malfunction	Strong Wind Gusts Out of the Northwest Caused the Instantaneous Upper Instrument Setpoint to be Reached for Stack Gas Span	Stack Gas Flow Rate	Span	Adjusted Fuel Flow
3/26/2012	11:26:26	3/26/2012	11:29:34	0:03:08	50	Malfunction	Strong Wind Gusts Out of the Northwest Caused the Instantaneous Upper Instrument Setpoint to be Reached for Stack Gas Span	Stack Gas Flow Rate	Span	Adjusted Fuel Flow
3/26/2012	12:18:18	3/26/2012	12:28:22	0:10:04	51	Malfunction	Strong Wind Gusts Out of the Northwest Caused the Instantaneous Upper Instrument Setpoint to be Reached for Stack Gas Span	Stack Gas Flow Rate	Span	Adjusted Fuel Flow
3/27/2012	13:57:24	3/27/2012	13:58:17	0:00:53	52	Malfunction	Instantaneous Upper Instrument Setpoint Reached for Scrubber Recirc. Rate Span	Scrubber Recirc. Rate	Span	Adjusted Recirc. Rate
3/30/2012	6:58:19	3/30/2012	7:00:30	0:02:11	53	Malfunction	Temperature Probe Faulted Which Caused the Instantaneous Upper Instrument Setpoint to be Reached for Baghouse Inlet Temperature Span	Baghouse Inlet Temp.	Span	Adjusted Inlet Temperature
4/1/2012	1:15:32	4/1/2012	1:16:31	0:00:59	54	Malfunction	Instantaneous Upper Instrument Setpoint Reached for LGF Flow Span	LGF Flow		Adjusted Fuel Flow
4/2/2012	23:05:52	4/3/2012	0:11:03	1:05:10	55	Malfunction	While Controlling LGF Line Pressure with Valves, a Fuel Flow Surge was Experienced which caused a Pressure Pulse in the Kiln System / No Fugitive Emissions were Witnessed / High CO's	Back Chamber Pressure, 1 Second Delay	Opl	Adjusted LGF Pump Pressure to Allow Finer Adjustments at the Kilns

NORLITE CORPORATION
MACT EXCEEDNACE REPORT - KILN 2
03/13/12 - 04/03/12

Start Date	Start Time	End Date	End Time	Downtime	#	Event	Cause	Parameter	Limit	Corrective Action
3/15/2012	9:04:27	3/15/2012	9:24:22	0:19:55	143	Malfunction	Instantaneous Upper Instrument Setpoint Reached for Stack Gas Span / I & E Cleaned Probe	Stack Gas Flow Rate	Span	I & E Cleaned Probe
3/16/2012	3:11:11	3/16/2012	3:11:45	0:00:34	144	Malfunction	Strong Wind Gusts Out of the Northwest Caused the Instantaneous Upper Instrument Setpoint to be Reached for Stack Gas Span	Stack Gas Flow Rate	Span	Adjusted Fuel Flow
3/16/2012	6:08:42	3/16/2012	6:09:31	0:00:49	145	Malfunction	Strong Wind Gusts Out of the Northwest Caused the Instantaneous Upper Instrument Setpoint to be Reached for Stack Gas Span	Stack Gas Flow Rate	Span	Adjusted Fuel Flow
3/16/2012	6:15:54	3/16/2012	6:17:09	0:01:15	146	Malfunction	Strong Wind Gusts Out of the Northwest Caused the Instantaneous Upper Instrument Setpoint to be Reached for Stack Gas Span	Stack Gas Flow Rate	Span	Adjusted Fuel Flow
3/16/2012	11:43:25	3/16/2012	11:45:26	0:02:01	147	Malfunction	Instantaneous Upper Instrument Setpoint Reached for Stack Gas Span	Stack Gas Flow Rate	Span	Adjusted Fuel Flow
3/19/2012	18:49:56	3/19/2012	18:50:20	0:00:24	148	Malfunction	Large Piece of Clinker Caught in the Kiln Hood Which Caused A Momentary Loss of Kiln Draft	Front End Kiln Pressure, 3 Second Delay	Opl	Removed Clinker and Re-established Draft
3/22/2012	5:05:40	3/22/2012	5:16:33	0:10:53	149	Malfunction	Instantaneous Upper Instrument Setpoint Reached for LGF Flow Span / Tank Switch	LGF Flow	Span	Switched Tanks
3/24/2012	8:34:07	3/24/2012	8:34:30	0:00:23	150	Malfunction	Large Piece of Clinker Caught in the Kiln Hood Which Caused A Momentary Loss of Kiln Draft	Front End Kiln Pressure, 3 Second Delay	Opl	Removed Clinker and Re-established Draft
3/26/2012	12:49:36	3/26/2012	14:02:25	1:12:49	151	Malfunction	Strong Wind Gusts Out of the Northwest Caused the Instantaneous Upper Instrument Setpoint to be Reached for Stack Gas Span	Stack Gas Flow Rate	Span	Adjusted Fuel Flow
3/26/2012	14:22:53	3/26/2012	14:31:15	0:08:22	152	Malfunction	Strong Wind Gusts Out of the Northwest Caused the Instantaneous Upper Instrument Setpoint to be Reached for Stack Gas Span	Stack Gas Flow Rate	Span	Adjusted Fuel Flow
3/26/2012	14:48:08	3/26/2012	15:04:27	0:16:19	153	Malfunction	Strong Wind Gusts Out of the Northwest Caused the Instantaneous Upper Instrument Setpoint to be Reached for Stack Gas Span	Stack Gas Flow Rate	Span	Adjusted Fuel Flow
3/26/2012	15:15:38	3/26/2012	15:20:47	0:05:09	154	Malfunction	Strong Wind Gusts Out of the Northwest Caused the Instantaneous Upper Instrument Setpoint to be Reached for Stack Gas Span	Stack Gas Flow Rate	Span	Adjusted Fuel Flow
3/26/2012	17:44:09	3/26/2012	18:15:48	0:31:39	155	Malfunction	Strong Wind Gusts Out of the Northwest Caused the Instantaneous Upper Instrument Setpoint to be Reached for Stack Gas Span	Stack Gas Flow Rate	Span	Adjusted Fuel Flow
3/26/2012	18:18:08	3/26/2012	18:54:17	0:36:09	156	Malfunction	Strong Wind Gusts Out of the Northwest Caused the Instantaneous Upper Instrument Setpoint to be Reached for Stack Gas Span	Stack Gas Flow Rate	Span	Adjusted Fuel Flow
3/26/2012	19:02:06	3/26/2012	21:03:27	2:01:21	157	Malfunction	Strong Wind Gusts Out of the Northwest Caused the Instantaneous Upper Instrument Setpoint to be Reached for Stack Gas Span	Stack Gas Flow Rate	Span	Adjusted Fuel Flow

3/26/2012	23:57:38	3/27/2012	1:21:21	1:23:42	158	Malfunction	Strong Wind Gusts Out of the Northwest Caused the Instantaneous Upper Instrument Setpoint to be Reached for Stack Gas Span	Stack Gas Flow Rate	Span	Adjusted Fuel Flow
3/27/2012	1:28:33	3/27/2012	1:39:32	0:10:59	159	Malfunction	Strong Wind Gusts Out of the Northwest Caused the Instantaneous Upper Instrument Setpoint to be Reached for Stack Gas Span	Stack Gas Flow Rate	Span	Adjusted Fuel Flow
3/27/2012	2:30:58	3/27/2012	3:09:57	0:38:59	160	Malfunction	Strong Wind Gusts Out of the Northwest Caused the Instantaneous Upper Instrument Setpoint to be Reached for Stack Gas Span	Stack Gas Flow Rate	Span	Adjusted Fuel Flow
3/27/2012	3:18:43	3/27/2012	4:00:23	0:41:40	161	Malfunction	Strong Wind Gusts Out of the Northwest Caused the Instantaneous Upper Instrument Setpoint to be Reached for Stack Gas Span	Stack Gas Flow Rate	Span	Adjusted Fuel Flow
3/27/2012	4:17:43	3/27/2012	4:27:06	0:09:23	162	Malfunction	Instantaneous Upper Instrument Setpoint Reached for Stack Gas Span	Stack Gas Flow Rate	Span	Adjusted Fuel Flow
3/27/2012	4:35:32	3/27/2012	5:59:35	1:24:03	163	Malfunction	Instantaneous Upper Instrument Setpoint Reached for Stack Gas Span/I&E Cleaning Probe	Stack Gas Flow Rate	Span	Adjusted Fuel Flow
3/27/2012	6:05:13	3/27/2012	8:16:42	2:11:29	164	Malfunction	Instantaneous Upper Instrument Setpoint Reached for Stack Gas Span/I&E Conducting Lime Calibrations	Stack Gas Flow Rate	Span	Adjusted Fuel Flow
3/29/2012	10:13:24	3/29/2012	10:16:30	0:03:06	165	Malfunction	Instantaneous Upper Instrument Setpoint Reached for LGF Flow Span	LGF Flow	Span	Adjusted Fuel Flow
3/29/2012	10:17:12	3/29/2012	10:17:44	0:00:32	166	Malfunction	Instantaneous Upper Instrument Setpoint Reached for LGF Flow Span	LGF Flow	Span	Adjusted Fuel Flow
3/29/2012	11:54:11	3/29/2012	12:02:13	0:08:02	167	Malfunction	Instantaneous Upper Instrument Setpoint Reached for LGF Flow Span	LGF Flow	Span	Adjusted Fuel Flow